UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

| BACKPAGE.COM, LLC, |) | |
|---|---------|----------------------------------|
| Plaintiff |)) | |
| v. |)))) | No. 3:12-cv-00654 JUDGE NIXON |
| ROBERT E. COOPER, JR., Attorney General of the State of Tennessee, et. al., |) | |
| Defendants |) | |

MOTION TO FILE EXHIBITS UNDER SEAL

Defendants, through their counsel, the Attorney General and Reporter, move to file Exhibits 1 and 2 of the Affidavit of Margie Quin under seal and to file redacted copies with the Affidavit. In support hereof, Defendants would show as follows:

- 1. Margie Quin is an Assistant Special Agent with the Tennessee Bureau of Investigation. Agent Quinn has submitted an Affidavit in this cause. The testimony in that Affidavit makes reference to various documents that are attached as exhibits. Exhibits 1 and 2 are TBI case studies related to investigations of sex trafficking in which the victims were minors. Such Exhibits contain names, dates of birth and other identifying information which could become subject to misuse.
- 2. To protect such victims, Defendants request leave of this Court to file redacted copies of such Exhibits. Redacted copies of those Exhibits are attached. Such Exhibits, if filed would remove redact dates of birth and other identifying information. For purposes of keeping an

accurate record, Defendants, if permitted to do so by this court, will file unredacted copies of the same Exhibits under seal with the Court.

Wherefore, premises considered, Defendants request leave to file redacted copies of Exhibits 1 and 2 to the Affidavit of Margie Quin with the Clerk and unredacted copies under seal with the Court.

Respectfully submitted,

ROBERT E. COOPER, JR. Attorney General and Reporter

/s/ Michael A. Meyer_

MICHAEL A. MEYER Deputy Attorney General Michael.Meyer@ag.tn.gov

LYNDSAY F. SANDERS (BPR# 22849) Senior Counsel Lyndsay.Sanders@ag.tn.gov

RACHEL JRADE-RICE (BPR#29245)
Assistant Attorney General
(application for admission pending)
Office of the Tennessee Attorney General
Law Enforcement & Special Prosecutions
P.O. Box 20207
Nashville, TN 37202-0207

Tel: 615.741.4087 Fax: 615.532.4892

CERTIFICATE OF SERVICE

I hereby certify that on July 26, 2012, the foregoing document was filed with the Clerk of Court through the Electronic Filing System. Notice of this filing will be sent by operation of the Court's Electronic Filing System to all counsel of record indicated on the electronic filing receipt.

/s/ Lyndsay F. Sanders LYNDSAY F. SANDERS (BPR# 22849)

Senior Counsel